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Attorney for Defendant
AETNA NETWORK SERVICES LLC

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Stacy Hudson, M.D., DBA
AdvancedENT Sinus Center,

Plaintiff,

vs.

Aetna Network Services LLC,
a CT Limited Liability Company,
Roe Entities I-X and Doe Individuals I-X,

Defendants.

Case No: 3:21-cv-00446-MMD-CLB

**STIPULATION TO EXTEND THE
TIME TO RESPOND TO THE
COMPLAINT**

**STIPULATION EXTENDING THE TIME TO RESPOND TO THE
COMPLAINT**

(First Request)

Pursuant to Local Rules of Civil Procedure 6-1 and 6-2, the parties hereby stipulate that the deadline for Defendant to respond to the Complaint shall be extended from October 22, 2021, to December 3, 2021. This is the First Request to extend the deadline. Good cause exists to extend the deadline so the parties may evaluate potential settlement and because Defendant needs time to identify and

1 evaluate the underlying claims at-issue in order to answer, move, or otherwise
2 respond to the Complaint.¹

3
4 DATED this 20th day of October, 2021.

5 FOX ROTHSCHILD LLP

6 By: Mark J. Connot
7 Mark J. Connot (10010)
8 *Attorney for Defendant Aetna Network*
9 *Services LLC*

10 LEMONS, GRUNDY & EISENBERG

11 By: Alice Campos Mercado
12 Alice Campos Mercado
13 *Attorney for Plaintiff Stacy Hudson,*
14 *M.D., dba AdvancedENT Sinus Center*

15 IT IS SO ORDERED:

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UNITED STATES MAGISTRATE JUDGE

17 Dated: October 21, 2021
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27 ¹ In accordance with the Local Rule 6-1IA, the Stipulation includes an “order in the form of a signature block on
28 which the court or clerk can endorse approval of the relief sought.” In addition, per the Court’s individual policies and procedures, a separate proposed order is also submitted.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the original of the foregoing has been electronically filed with the Clerk, United States District Court for the District of Nevada, and that a copy has been served this date, via ECF, upon all counsel of record.

Dated: October 20, 2021

FOX ROTHSCHILD LLP

By: Mark J. Connot
Mark J. Connot (10010)
*Attorney for Defendant Aetna Network
Services LLC*

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) Case No: 3:21-cv-00446-MMD-CLB

) **STIPULATION TO EXTEND THE**
) **TIME TO RESPOND TO THE**
) **COMPLAINT**

(PROPOSED) ORDER

AND NOW, on this _____ day of _____, 2021, in consideration of the parties Stipulation for an Extension of Time for Defendant to Respond to the Complaint, it is **HEREBY ORDERED** that the Stipulation is Granted. Defendant shall answer, move, or otherwise respond to the Complaint on or before December 3, 2021.

IT IS SO ORDERED:

The Honorable Miranda M. Du,
UNITED STATES DISTRICT JUDGE

Dated: _____